



COUNTY OF ERIE

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DEPARTMENT OF LAW

December 27, 2024

The Honorable Leslie G. Foschio
United States District Court for the Western District of New York
2 Niagara Square
Buffalo, New York 14202

Re: Ricks, Keyontay v. Chris Dates, et. al.
Our File No.: 9-20240015
Case No.: 20-cv-43-LVJ-LGF

Dear Hon. Judge Foschio:

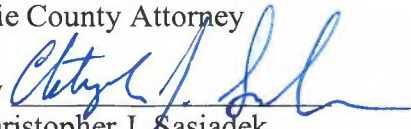
I represent the non-party, Erie County District Attorney's Office (the "ECDA") in this matter, and I write to request an extension to the deadlines provided by this Honorable Court in an Order issued on December 6, 2024. (Dkt. Doc. 83). Plaintiff's counsel has represented that they support the extension of the deadlines to allow the parties time to work out a production dispute between themselves without relying on the Court for intervention.

The Order pertained to a December 3, 2024 motion by the Plaintiff to find the ECDA in contempt for an alleged failure to produce certain documents. Since that time, ECDA has produced additional documents to the Plaintiff, and Plaintiff is reviewing the produced documents to ensure they comply completely with Plaintiff's demand. Plaintiff has represented he will withdraw his motion if those documents fully comply with this Court's requirements.

If the Court is amenable, the ECDA requests that all deadlines be moved forward one month, so that responses to the motion are due on January 27, 2025; replies due by February 6, 2025; and surreplies, if any, are due February 10, 2025.

Very truly yours,

JEREMY C. TOTH
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